DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Mid-Atlantic Region D1079B

Food and Drug Administration
Waterview Corporate Center
10 Waterview Blvd., 3rd Floor
Parsippany, NJ 07054

Telephone (201) 331-2904

January 8, 1997

WARNING LETTER

RELEASE
REVIEWED BY C.O. 1/14/97 DATE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mr. John R. Stafford, President and CEO
American Home Products, Inc.
5 Giralda Farms
Madison, New Jersey 07940

FILE NO.:97-NWJ-14

Dear Mr. Stafford:

This is regarding an inspection of your facility, Wyeth Ayerst-ESI Lederle, located at 2 Esterbrook Lane, Cherry Hill, New Jersey by the U.S. Food and Drug Administration between the dates of October 15 and November 6, 1996. During the inspection our investigators documented serious deviations from the current good manufacturing practices regulations (Title 21, Code of Federal Regulations, Part 210 and 211) in conjunction with your firm's manufacture of prescription drugs.

These deviations were presented to your firm's attention on an FD-483 List of Observations at the close of the inspection on November 6, 1996. These CGMP deficiencies cause your products to be adulterated within the meaning of Section 501(a)(2)(B) of the Federal Food, Drug, and Cosmetic Act.

1. Wyeth Ayerst-ESI Lederle has not set appropriate finished product specifications for Sodium Chloride 2 ml vials and 5 ml ampules.

2. There is insufficient data to justify the incubation temperature of [redacted] for media-filled vials which were filled and incubated.

3. The current written procedures do not require investigation of low fill volumes which occur during the manufacture of Sodium Chloride.

4. Failure to have complete written preventative maintenance procedures for the firm's Water for Injection system.

5. Wyeth Ayerst-ESI Lederle does not always implement investigative corrective actions in a timely manner and does not always extend to other areas which may be associated with the situation under investigation. For example:

On June 10, 1996, 10 cfu's were isolated from a water sample collected at [redacted] which is located in the [redacted]. The investigation concluded that exposed pipe insulation may have caused the contamination and the corrective action to remove or cover the insulation was proposed.

On August 19, 1996, six(6) cfu's were isolated from a water sample collected at [redacted] which is located in the [redacted]. The investigation again concluded that exposed pipe insulation may have caused the contamination. On September 18, 1996, the pipe insulation was removed from the valve.

On October 16, 1996, 10 cfu's were isolated from a water sample collected at [redacted] which is located in the [redacted]. The investigation concluded that wet insulation most likely caused the contamination. On October 23, 1996 the pipe insulation was removed from this valve.

We have received your firm's response letter dated December 31, 1996 concerning our observations noted on the FD-483. We have reviewed your proposed corrective actions that pertain to the GMP deficiencies, and they appear to be adequate. However, regarding your response to observation #7, we have never received any data that demonstrates the incubation temperature of 30-35° C, for your media filled containers is sufficient to support the aseptic qualification. If we do receive any data at a later date, we will review it and make it a part of our permanent record on this matter.

We will confirm the adequacy of your intended corrective actions during our next FDA inspection. However, it is your responsibility to ensure all requirements of the Federal Food, Drug, and Cosmetic Act and the regulations promulgated thereunder are being met. We recommend that you conduct a complete evaluation of your facility for CGMP compliance.

The above identification of violations is not intended to be an all-inclusive list of deficiencies at your facility. We request that you take prompt action to correct these deviations. If such action is not taken, the Food and Drug Administration is prepared to invoke regulatory sanctions provided under the law. These include seizure and/or injunction.

In addition, until adequate corrective actions have been taken the Food and Drug Administration will not approve NDA's, ANDA's, request for evaluation by government procurement agencies which your firm may have pending involving drug products.

Any additional information you wish to submit should be sent to the Food and Drug Administration, Parsippany, New Jersey 07054. Attention: Andrew Ciaccia, Compliance Officer.

Very truly yours,

JOANN M. GIVENS
Acting District Director
New Jersey District Office

AC:slw

cc: Mr. Robert Essner
President of Wyeth Ayerst
555 E. Lancaster Ave.
St. David's (Radner Twp), PA 19087

Mr. Basil P. Gordon, Managing Director
Wyeth Ayerst-ESI, Lederle
2 Esterbrook Lane
Cherry Hill, NJ 08034

bcc: HFI-35 (FOI Staff - stamped & purged copy)
HFA-224
HFD-300
HFC-210 (Division of Compliance Policy)
EF (Wyeth Ayerst-ESI Lederle, Inc., Cherry Hill, NJ)
HFR-MA300 (DD)
HFR-MA350 [DIB/Gp5 (McCullough/Smith)]
HFR-MA320 (PSAU)
HFR-MA340 (DCBr/AC/WL File/Legal File)

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